

## CERTIFICATE OF COMPLIANCE

Case No. 23-12

Caption: Kowal v. Ferndale Area School District,  
et al.

As required by Supreme Court Rule 33.1(h),  
I certify that the document contains 1,915 words,  
excluding the parts of the document that are  
exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the  
foregoing is true and correct.

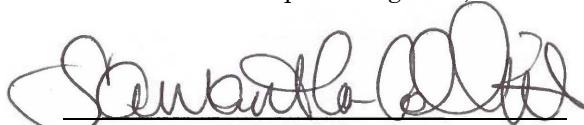
Executed on September 5, 2023.

  
Carolyn Adkins  
Carolyn Adkins  
Record Press, Inc.

Sworn to before me on

September 5, 2023

Samantha Collins  
Notary Public, State of New York  
No. 01CO6437788  
Qualified in Kings County  
Commission Expires August 1, 2026

  
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Samantha Collins  
Notary Public